

## REMARKS

Claims 1-35 are pending. Claims 1, 2, 3, 7, 8, 15, 16, 21, 24, 26, and 30 are amended herein. Claims 31-40 are newly added. No new matter is added as a result of the amendments.

### Claim Objections

Claims 2 and 7 are objected to because of alleged informalities cited in the outstanding Office Action. The Claims have been amended so as to obviate the cited objections. Accordingly, the Applicants respectfully request the withdrawal of the objections to Claims 2 and 7.

### 102 Rejection

Claims 1, 2, 4, 8-14, 16-19, 21, 23-26, and 28 are rejected under 35 U.S.C. § 102(e) as being anticipated by Khan et al. (U.S. Patent 6,029,046). The Applicants have reviewed the cited reference and respectfully submit that the embodiments of the present invention as set forth in Claims 1, 2, 4, 8-14, 16-19, 21, 23-26, and 28 are neither anticipated nor rendered obvious by Khan et al.

The Examiner is respectfully directed to independent Claim 1 which sets forth an embodiment of the present invention drawn to a removable electronic media service module that includes:

... a tuner dedicated to receive a single media content signal carrying media content; a hard disk storage device coupled to receive said media content from said tuner; and an adapter coupled to said hard disk storage device and to said tuner, said adapter for interfacing said removable electronic media service module with an electronic media output system.

Independent Claims 4, 8 and 16 recite limitations similar to those of Claim 1. Claims 2 and 3 depends from Claim 1, Claims 9-14 depend from Claim 8, and Claims 17-19, 21, 23-26 and 28 depend from Claim 16 and recite further features of the Claimed invention.

Khan et al. does not anticipate or render obvious a removable electronic media service module that includes "... a tuner dedicated to receive a single media content signal carrying media content; a hard disk-storage device coupled to receive said media content from said tuner; and an adapter" as is recited in amended Claim 1. Khan et al. discloses a game delivery service including flash memory and game backup module. It should be appreciated that Kahn et al. teaches the use of dynamic RAM as well as flash memory data storage but does not teach the use of a hard disk storage device to store a single media content signal as is recited in amended Claim 1. In fact, nowhere in the Khan et al. reference is the use of a hard disk storage device to store a single media content signal received from a tuner dedicated to receive the single media content signal taught or suggested as is recited in Claim 1 (Claims 4, 8, and 16 contain similar limitations).

Moreover, Khan et al. does not anticipate or render obvious a removable electronic media service module that includes "a first adapter for receiving a tuner constantly tuned to receive a single broadcast signal" and "a second adapter for receiving a media storage device coupled to said tuner" as is recited in Claim 4. The recited first and second adapters of Claim 4 are equated in the Office Action respectively to data busses 230 and 240 that are shown in Figure 2A of the Khan et al. reference. It should be appreciated that the data busses (230 and 240 in the Kahn et al. reference) couple individual components of the system of Khan et al. and provide a means of transferring data between the coupled components of the Khan et al.

system. In contrast, the first and second adapters that are recited in Claim 4 physically accommodates system modules and adapts the modules for coupling to other components of the Applicants' claimed system. Applicants respectfully submit that the recited first and second adapters of Applicants' Claim 4 and the data busses that are disclosed by Khan et al. are both structurally and functionally distinct which precludes the reasonable interpretation of these structures as equivalents.

In summary, Khan et al. does not teach or suggest teach a hard disk storage device as is recited in amended Claim 1 (Claims 4, 8, and 16 contain similar limitations), or first and second adapters as is recited in Claim 4. Consequently, Khan does not anticipate or render obvious the embodiments of the Applicants' invention as are set forth in Claims 1, 4, 8, and 16.

Accordingly, the Applicants also respectfully submit that Khan et al. does not anticipate or render obvious the present claimed invention as is recited in Claim 2 dependent on Claim 1, Claims 9-14 dependent on Claim 8, Claims 17-19, 21, 23-26 and 28 dependent on Claim 16 and that these Claims overcome the basis for rejection under 35 U.S.C. 102(e) as being dependent on an allowable base claim.

### 103 Rejections

Claim 3 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent 6,029,046) in view of Strubbe et al. (U.S. Patent 5,483,278). Khan et al. in view of Strubbe et al. does not anticipate or render obvious a removable electronic media service module that includes "... a tuner dedicated to receive a single media content signal carrying media content; a hard disk-storage device coupled to receive said media content from said tuner; and an adapter" as is recited in Claim 1 (from which Claim 3 depends). It should be appreciated that Strubbe et al. does not remedy the deficiencies of Khan et al. outlined above

in meeting the aforementioned limitations. Strubbe et al. only shows a system and method for finding a movie of interest in a large movie database. Nowhere in the Strubbe et al. reference is there taught or suggested a dedicated tuner that is constantly tuned to receive a single broadcast signal and that is coupled to a hard disk storage device as is recited in the Claim 1 from which Claim 3 depends. Consequently, Khan et al. in view of Strubbe et al. does not anticipate or render obvious the embodiments of the Applicants' invention as are set forth in Claim 3.

Claims 5 and 6 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent 6,029,046) in view of Sata et al. (U.S. Patent 5,134,499). Khan et al. in view of Sata et al. does not anticipate or render obvious a removable electronic media service module that includes "a first adapter for receiving a tuner constantly tuned to receive a single broadcast signal" and "a second adapter for receiving a media storage device coupled to said tuner" as is recited in Claim 4 (from which Claims 5 and 6 depend). It should be appreciated that Sata et al. does not remedy the deficiencies of Khan et al. outlined above in meeting the aforementioned limitations. Sata et al. only shows a video apparatus having control means provided therein for independently controlling the writing and reading heads. Nowhere in the Sata et al. reference is there taught or suggested a first adapter for receiving a tuner constantly tuned to receive a single broadcast signal and a second adapter for receiving a media storage device coupled to the tuner as is recited in Claim 4 from which Claims 5 and 6 depends. Consequently, Khan et al. in view of Sata et al. does not anticipate or render obvious the embodiments of the Applicants' invention as are set forth in Claims 5 and 6.

Claim 7 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent 6,029,046) in view of Sata et al. (US Patent 5,134,499), in further view of Gerba et al. (5,931,908). Khan et al. in view of Sata et al. in further view of Gerba et al. does not anticipate or render obvious a removable electronic media service module that includes "a first

adapter for receiving a tuner constantly tuned to receive a single broadcast signal” and “a second adapter for receiving a media storage device coupled to said tuner” as is recited in Claim 4 (from which Claim 7 depends). It should be appreciated that Sata et al. and Gerber et al., either alone or in combination, do not remedy the deficiencies of Khan et al. outlined above in meeting the aforementioned limitations. Sata et al. only shows a video apparatus having control means provided therein for independently controlling the writing and reading heads. Gerba et al. only shows a method and apparatus for linking real time data with audiovisual content. Nowhere in the Gerba et al. reference is there taught or suggested a first adapter for receiving a tuner constantly tuned to receive a single broadcast signal and a second adapter for receiving a media storage device coupled to the tuner as is recited in Claim 4 (from which Claim 7 depends). Consequently, Khan et al. in view of Sata et al. in further view of Gerba et al. does not anticipate or render obvious the embodiments of the Applicants’ invention as are set forth in Claim 7.

Claims 15 and 20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent 6,029,046) in view of Doornheim et al. (US Patent 6,078,360). Khan et al. in view of Doornheim et al. (6,078,360) does not anticipate or render obvious a removable electronic media service module that includes “broadcasting said media signal to an on site media system having a dedicated tuning device and a dedicated portion of a hard disk for said media signal” as is recited in Claim 16 from which Claim 20 depends (Claim 8 from which Claim 15 depends contains similar limitations). It should be appreciated that Doornheim et al. does not remedy the deficiencies of Khan et al. outlined above in meeting the aforementioned limitations. Doornheim et al. only teaches a television signal that includes “additional” data. Nowhere in the Doornheim et al. reference is it taught or suggested that a media signal be broadcasted to an on site media system that has a dedicated tuning device and a dedicated portion of a hard disk for the media signal as is recited in Claims 8 and 16 (from which Claims 15 and 20 depend respectively). Consequently, Khan et al. in view of

Doornheim et al. does not anticipate or render obvious the embodiments of the Applicants' invention as are set forth in Claims 15 and 20.

Claim 22 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent 6,029,046) in view of Lawler et al. (US Patent 5,905,763). Khan et al. in view of Lawler et al. (5,905,763) does not anticipate or render obvious a removable electronic media service module that includes "broadcasting said media signal to an on site media system having a dedicated tuning device and a dedicated portion of a hard disk for said media signal" as is recited in Claim 16. It should be appreciated that Lawler et al. does not remedy the deficiencies of Khan et al. outlined above in meeting the aforementioned limitations. Lawler et al. only shows a system and method for recording programs in an interactive viewing system. Nowhere in the Lawler et al. reference is it taught or suggested that a media signal be broadcasted to an on site media system that has a dedicated tuning device and a dedicated portion of a hard disk for the media signal as is recited in Claim 16 from which Claim 22 depends. Consequently, Khan et al. in view of Lawler et al. does not anticipate or render obvious the embodiments of the Applicants invention as is set forth in Claim 22.

Claim 27 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent 6,029,046) in view of Gerba et al. (5,931,908). Khan et al. in view of Gerba et al. does not anticipate or render obvious a removable electronic media service module that includes "broadcasting said media signal to an on site media system having a dedicated tuning device and a dedicated portion of a hard disk for said media signal" as is recited in Claim 16. It should be appreciated that Gerba et al., does not remedy the deficiencies of Khan et al. outlined above in meeting the aforementioned limitations. Gerba et al. only shows a method and apparatus for linking real time data with audiovisual content. Nowhere in the Gerba et al. reference is it taught or suggested that a media signal be broadcasted to an on site media system that has a dedicated tuning device and a dedicated portion of a hard disk for the media

signal as is recited in Claim 16 from which Claim 27 depends. Consequently, Khan et al. in view of Gerba et al. does not anticipate or render obvious the embodiments of the Applicants invention as is set forth in Claim 27.

Claim 30 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent 6,029,046) in view of Sata et al. (US Patent 5,134,499), in further view of Krause (6,304,714). Khan et al. in view of Sata et al. in further view of Krause et al. does not anticipate or render obvious a removable electronic media service module that includes “broadcasting said media signal to an on site media system having a dedicated tuning device and a dedicated portion of a hard disk for said media signal” as is recited in Claim 16. Sata et al. and Krause et al., either alone or in combination do not remedy the deficiencies of Khan et al. outlined above in meeting the aforementioned limitation. Sata et al. only shows a video apparatus having control means provided therein for independently controlling the writing and reading heads. Krause et al. only shows an in home digital video unit with combined archival and high access storage. Nowhere in the Sata et al. and Krause et al. references is it taught or suggested that a media signal be broadcasted to an on site media system having a dedicated tuning device and a dedicated portion of a hard disk for the media signal as is recited in Claim 16 from which Claim 30 depends. Consequently, Khan et al. in view of Sata et al. in further view of Krause et al. does not anticipate or render obvious the embodiments of the Applicants invention as is set forth in Claim 30.

#### Conclusion

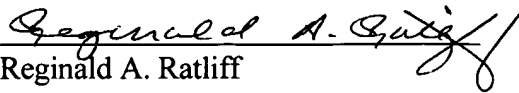
In light of the above remarks, the Applicants respectfully request allowance of the pending Claims.

The Examiner is urged to contact the Applicants’ undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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